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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**

**SEAN COLBY HOARD,**

Plaintiffs,

v.

**Snake River Correctional Institution**  
*et. al*

Defendants.

Case No.: 2:13-cv-02161-BR

**DECLARATION OF SEAN  
HOARD**

I, Sean Colby Hoard, declare as follows:

1. I am the plaintiff in this action.
2. I was released from prison in 2016. I was released early after I won my criminal appeal.
3. The first two or three months after I was released, I lived at the Shoreline, a halfway house. After that, I stayed with my family for some time but ultimately, I became homeless.
4. I have struggled with serious mental health issues since my release from prison. I was given a diagnosis of Schizoaffective Disorder. Schizophrenia runs in my family. I

have two uncles who are schizophrenic. I have not had stable access to anti-psychotic medications since being released from prison. When I do not have my medications, my symptoms are severe. I hear voices in my head, I see things that other people do not see, and my mood swings are extreme. I struggle with depression and the inability to cope with my situation. Struggling to find a safe and warm place to sleep, something to eat, and take a shower every night was especially difficult with my mental health issues.

5. In the fall and winter of 2018-2019 I was homeless and living on the streets. I periodically saw my mom. I did not have access to my mental health medication. I did not have a phone number or a home address, other than my mom's address.
6. I did not hear anything about this case until I heard from my lawyers. My mom gave me a letter from my attorneys, telling me there was a hearing I had to go to or the case would be dismissed. By the time I got their letter it was past the scheduled court date. I called my lawyers over and over again but never got a response. I was devastated that my case was dismissed.
7. I was then incarcerated again for four or five months.
8. Recently, I was talking to a friend and telling him about this case and how it was dismissed. He suggested I contact attorney Lynn Walsh. That was about two weeks ago. I immediately called her several times and left her several voicemails. Eventually she connected me with my current attorney, Viktoria Safarian.
9. Viktoria Safarian and I first spoke on October 4, 2019. Following that conversation, we prepared to file this motion.

**DATED** this 8<sup>th</sup> day of October, 2019.

By: Sean Hoard  
Sean Hoard